

**IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

DR. AMY R. WOODS

PLAINTIFF

VS.

CAUSE NO. 3:19-CV-00234-NBB-RP

**MHM HEALTH PROFESSIONALS, LLC, D/B/A
CENTURION PROFESSIONALS;
MANAGEMENT & TRAINING CORPORATION;
JESSE WILLIAMS, INDIVIDUALLY; AND
JOHN DOES 1-9**

DEFENDANTS

**PLAINTIFF’S RESPONSE IN OPPOSITION TO MOTION
FOR SUMMARY JUDGMENT OF DEFENDANTS
MANAGEMENT & TRAINING CORPORATION AND
JESSE WILLIAMS, INDIVIDUALLY**

COMES NOW Plaintiff Dr. Amy R. Woods (“Dr. Woods”), by and through counsel, and files this Response in Opposition to Motion for Summary Judgment of Defendants Management & Training Corporation (“MTC”) and Jesse Williams, Individually (“Williams”) [Doc. 129], and in support thereof would respectfully show unto the Court as follows:

1. MTC and Williams filed their Motion for Summary Judgment [Doc. 129] on October 26, 2020.
2. Dr. Woods will show that MTC’s and Williams’ motion [Doc. 129] is not well-taken.
3. In support of this response, Dr. Woods relies on the following evidentiary material:
 - a. Curriculum vitae of Dr. Amy R. Woods, attached hereto as Exhibit “A”;
 - b. Deposition of Dr. Amy Woods, attached hereto as Exhibit “B”;

- c. Agreement Between the State of Mississippi Department of Corrections and Centurion of Mississippi, LLC for Onsite Inmate Health Services, attached hereto as Exhibit “C”;
- d. Deposition of Jerry Williams, attached hereto as Exhibit “D”;
- e. Deposition of Beverly McMullen, attached hereto as Exhibit “E”;
- f. Offer of Employment, dated October 12, 2016, attached hereto as Exhibit “F”;
- g. Deposition of Dr. Clayton Ramsue, attached hereto as Exhibit “G”;
- h. Deposition of Travis Day, attached hereto as Exhibit “H”;
- i. Deposition of April Meggs, attached hereto as Exhibit “I”;
- j. Email from Hunter Williamson to Dr. Woods, dated August 27, 2018, attached hereto as Exhibit “J”;
- k. Deposition of Kristie Huff, attached hereto as Exhibit “K”;
- l. Statement of Dr. Woods, dated June 25, 2019, attached hereto as Exhibit “L”;
- m. Email from Travis Day to April Meggs, dated June 18, 2019, attached hereto as Exhibit “M”;
- n. Email from Travis Day to Jesse Williams, dated June 18, 2019, attached hereto as Exhibit “N”;
- o. Deposition of Sara Revell, attached hereto as Exhibit “O”;
- p. Involuntary Termination Report, attached hereto as Exhibit “P”;
- q. Deposition of Representative Bill Kinkade, attached hereto as Exhibit “Q”;
- r. Deposition of Jesse Williams, attached hereto as Exhibit “R”;
- s. Deposition of Grace Owens, attached hereto as Exhibit “S”; and
- t. Email from Jesse Williams to Travis Day, dated June 26, 2019, attached hereto as Exhibit “T.”

4. A memorandum brief in opposition to MTC's and Williams' motion [Doc. 129] is being filed concurrently herewith.

WHEREFORE, PREMISES CONSIDERED, Plaintiff Dr. Amy R. Woods respectfully requests that the Motion for Summary Judgment of Defendants Management & Training Corporation and Jesse Williams, Individually [Doc. 129] be denied on the First Amendment and intentional interference claims.

RESPECTFULLY SUBMITTED, this the 23rd day of November, 2020.

DR. AMY R. WOODS, Plaintiff

By: /s/ Jim Waide

Jim Waide, MS Bar No. 6857

waide@waidelaw.com

Rachel Pierce Waide, MS Bar No. 100420

rpierce@waidelaw.com

WAIDE & ASSOCIATES, P.A.

332 North Spring Street

Tupelo, MS 38804-3955

Post Office Box 1357

Tupelo, MS 38802-1357

(662) 842-7324 / Telephone

(662) 842-8056 / Facsimile

R. Shane McLaughlin, MS Bar No. 101185

rsm@mclaughlinlawfirm.com

McLAUGHLIN LAW FIRM

347 North Spring Street

Tupelo, MS 38804-3943

Post Office Box 200

Tupelo, MS 38802-0200

(662) 840-5042 / Telephone

(662) 840-5043 / Facsimile

ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

This will certify that undersigned counsel for Plaintiff has this day filed the above and foregoing with the Clerk of the Court, utilizing the federal court electronic case data filing system (CM/ECF), which sent notification of such filing to the following:

Elizabeth Ross Hadley, Esquire
Greenberg Traurig, LLP
300 West 6th Street, Suite 2050
Austin, TX 78701-4236
hadleye@gtlaw.com
pinkertonv@gtlaw.com
weathingtonm@gtlaw.com
kellyc@gtlaw.com
dumitrul@gtlaw.com
harrisa@gtlaw.com
GableL@gtlaw.com

David W. Long-Daniels, Esquire
Greenberg Traurig, LLP
3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305-1780
long-danielsd@gtlaw.com
thomasr@gtlaw.com

Jacob R. Dean, Esquire
Greenberg Traurig, LLP
3333 Piedmont Road NE, Suite 2500
Atlanta, GA 30305-1780
deanj@gtlaw.com
thomasr@gtlaw.com

COUNSEL FOR DEFENDANT MHM HEALTH PROFESSIONALS, LLC
D/B/A CENTURION PROFESSIONALS

Timothy M. Peebles, Esquire
Daniel Coker Horton and Bell, P.A.
Post Office Box 1396
Oxford, MS 38655-1396
Tpeeples@danielcoker.com
sbelk@danielcoker.com
nmoore@danielcoker.com
ttaylor@danielcoker.com

J. Caroline Johnson, Esquire
Daniel Coker Horton and Bell, P.A.
Post Office Box 1396
Oxford, MS 38655-1396
cajohnson@danielcoker.com
nmoore@danielcoker.com

**COUNSEL FOR DEFENDANTS MANAGEMENT & TRAINING CORPORATION
AND JESSE WILLIAMS**

DATED, this the 23rd day of November, 2020.

/s/ Jim Waide

Jim Waide